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Co-Lead Counsel for Personal Injury and School District/Local Government Entity Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

This Document Relates to:

ALL ACTIONS

**DECLARATION OF JASON L.
LICHTMAN IN SUPPORT OF
STIPULATION REGARDING BRIEFING
SCHEDULE ON DEFENDANTS'
MOTIONS FOR INTERLOCUTORY
APPEAL**

I, Jason L. Lichtman, declare and state as follows:

1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP and Counsel for the Personal Injury and School District/Local Government Entity Plaintiffs in this action. I am a member in good standing of the State Bar of Utah. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Under Civil Local Rule 7-3, Plaintiffs' deadline to oppose Defendants' motions for interlocutory appeal (ECF 1460, 1462) is currently December 30, 2024. Plaintiffs' attorneys—

1 including the key personnel I expect to work on this opposition—have pre-planned family and
2 other obligations between now and December 30.

3 3. The Parties met and conferred on December 23, 2024, and all Parties agreed the
4 schedule on Defendants' motions for interlocutory appeal should be extended to allow the
5 briefing to occur after the holiday season.

6 4. I am not aware of any exigent circumstances that would require Plaintiffs to
7 oppose Defendants' motions for interlocutory appeal by December 30, 2024, as opposed to the
8 requested deadline of January 14, 2025.

9 5. This request is nearly identical to the one the parties agreed to a year ago when
10 Defendants moved for interlocutory appeal from the Court’s prior orders: after Defendants filed
11 their motion for interlocutory appeal on December 12, 2023 (ECF 473), the Court agreed to
12 extend Plaintiffs’ opposition deadline to January 9, 2024, and Defendants’ reply deadline to
13 January 19, 2024 (ECF 479 at 3). The same concerns animating that extension are again present
14 here.

15 6. Extending the deadlines with respect to Defendants' motions for interlocutory
16 appeal will not affect any other deadline ordered by the Court.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed on
18 December 24, 2024, in Salt Lake City, Utah.

/s/ Jason L. Lichtman
Jason L. Lichtman